

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

KIMBERLI RIDGEWAY

CIVIL ACTION NO. 5:10-cv-01843

VERSUS

JUDGE STAGG

UNIVERSAL ENSCO, INC.

MAGISTRATE JUDGE HORNSBY

**MOTION TO APPEAR PRO HAC VICE
AND TO WITHDRAW CO-COUNSEL**

NOW INTO COURT, through undersigned counsel, comes UNIVERSAL ENSCO, INC., defendant herein, which respectfully submits the following:

1.

Daniel J. Schuch is an associate in the firm of Cozen O'Connor, P.C., of Houston, Texas, and one of the attorneys for defendant in this action.

2.

He is a member in good standing of the bar of the State of Texas. Attached as Exhibit 1 is a Certificate of Good Standing.

3.

Pursuant to Local Rule 20.06, there has been no disciplinary proceedings or criminal charges instituted against him.

4.

He authorizes the Clerk of Court for the Western District of Louisiana to transmit notice of entries of judgments and orders to him under Fed.R.Civ.P. 77, Fed.Cr. P. 49, LR 5.7.10W. He also agrees to receive notice electronically from other parties and the Court via electronic mail. He understands that electronic mail filter software (SPAM filter) may interfere with receipt of

email notices and has verified that any such software installed on his computer or network will not filter our messages sent from enoticing@lawd.uscourts.gov. He understands this electronic notice will be in lieu of notice by any other means. He understands it is his responsibility to advise the Clerk's Office promptly in writing of any physical address changes and/or update his electronic mail address within the Court's electronic filing system.

5.

Defendant also desires that Alfonso A. Kennard be allowed to withdraw as co-counsel of record.

WHEREFORE, DEFENDANT, UNIVERSAL ENSCO, INC., PRAYS that an order issue herein allowing Daniel J. Schuch to enroll as co-counsel for defendant, Universal Enesco, Inc., and allowing Alfonso A. Kennard to withdraw as co-counsel for defendant, Universal Enesco, Inc.

Respectfully submitted,

COZEN O'CONNOR, P.C.

By: /s/Daniel J. Schuch
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INC.**

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CERTIFICATE

I HEREBY CERTIFY that a copy of the above and foregoing has been filed electronically with the Clerk of Court using the CM/ECF system. I also certify that said copies have been served on opposing counsel through the CM/ECF system.

Shreveport, Louisiana, this 13th day of December, 2011.

s/ Michael D. Lowe

OF COUNSEL